UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
DAVID CORCIA	
Plaintiff,	Case No. 7:17-cv-01751-NSR
v.	
BARCLAYS BANK DELAWARE;	
EQUIFAX INFORMATION SERVICES, LLC;	
EXPERIAN INFORMATION SOLUTIONS,	
INC.; TRANS UNION, LLC,	
Defendants.	

## NOTICE OF DEPOSITION

TO: All Counsel of Record

**PLEASE TAKE NOTICE** that the undersigned will take the deposition by oral examination of Defendant Barclays Bank Delaware's Designated Witness or Witnesses pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, at the date, time, and location designated below:

Date	Time	Location
August 24, 2017	12pm	Reed Smith 1201 Market Street Suite 1500 Wilmington, DE 19801

Said deposition will be taken by stenographic means before a person authorized to take depositions pursuant to Rule 28 of the Federal Rules of Civil Procedure. This notice supersedes all previous notices, if any.

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## MATTERS UPON WHICH EXAMINATION IS REQUESTED

The person or persons you designate must be prepared to discuss, and competent to testify about information known or reasonably available to your organization, including the following:

- 1. Your Answer and Affirmative Defenses to the Complaint in this action;
- 2. All documents identified in your Rule 26(a)(1) initial disclosures;
- 3. Your responses and objections to any interrogatories proffered to you in this action;
- 4. Your responses and objections to any requests for production of documents proffered to you in this action, including a review of any documents produced by any party to this action;
- 5. Your policies and procedures relating to your duties and obligations under the Fair Credit Reporting Act;
- 6. All activities, acts, and omissions performed by you pursuant to the Fair Credit Reporting Act relating to the Plaintiff in this action.

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice of Deposition was served on all counsel of record by email and/or regular US Mail on 8/17/17, addressed as follows:

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**By:** /s/ Shimshon Wexler

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